

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

OSMOSE UTILITIES SERVICES,)
INC.,)

Plaintiff,)

v.)

ROBIN MCDANIEL,)

Defendant.)

CIVIL ACTION FILE NO:
3:22-cv-00185-TCB

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO
DESIGNATE SEAN W. MARTIN AS LOCAL COUNSEL
FOR *PRO HAC VICE* APPLICATION**

COME NOW Defendant, Robin McDaniel, and hereby moves the Court, pursuant to Local Rule 83.1(B)(4) for leave to designate Sean W. Martin as local counsel for the purpose of a forthcoming *pro hac vice* application. In support of her motion, Defendant states as follows:

1. Sean W. Martin is counsel of record for Defendant. He is admitted to the State Bar of Georgia and to this Court, and he is a shareholder of Carr Allison. His office is located in Chattanooga, Tennessee, where he resides.

2. Defendant wishes for attorney Melisa C. Zwilling to appear on her behalf under *pro hac vice* admission. Ms. Zwilling is a shareholder of Carr Allison,

and her office is located in Birmingham, Alabama. Ms. Zwilling is not admitted to practice before this Court.

3. Local Rule 83.1(B)(4) ordinarily requires that, for purposes of *pro hac vice* admissions, the applicant must designate local counsel who maintains an office within the Northern District of Georgia. However, the Court may modify this requirement “for good cause.”

4. Defendant submits that, for several reasons, good cause exists to allow Mr. Martin to serve as local counsel in this matter. Mr. Martin is admitted to practice before this Court, and his office is located very near this district, in Chattanooga, Tennessee. Mr. Martin belongs to the same law firm as the applicant, and the applicant’s primary role will be to assist in representing Defendant. Further, Defendant and other witnesses are located in Alabama, and the applicant is thus in a better position than Mr. Martin to interact with Defendant and participate in depositions and other discovery especially under the expedited discovery schedule set out in the Court’s November 18, 2022 Order. (D.E. 5).

5. Counsel for Defendant has spoken with counsel for Plaintiff, who does not oppose this motion.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that the Court grant her motion and permit Defendant to designate Mr. Martin as local counsel for purposes of Ms. Zwilling's *pro hac vice* application.

CARR ALLISON

BY: /s/ Sean W. Martin
SEAN W. MARTIN, GABPR #474125
Attorney for Defendant
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CERTIFICATE OF COMPLAINE

Pursuant to Local Rule 7.1(D), I hereby certify the foregoing document complies with the font and point selections permitted by Local Rule 5.1(B). This document was prepared on a computer using Times New Roman font in 14 point.

This 22nd day of November, 2022.

CARR ALLISON

By: /s/ Sean W. Martin
SEAN W. MARTIN, GA BAR #474125

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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